



U.S. DEPARTMENT OF TRANSPORTATION
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Mr. Ross Macfarlane, Director
Legal and Environmental Affairs
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Document Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street SW
Washington, D.C. 20590-0001

RE: Green Line Draft Environmental Impact Statement – Seattle Monorail Project

Dear Mr. Macfarlane:

The Puget Sound Regional Council appreciates the opportunity to comment on the Green Line Draft Environmental Impact Statement for the Seattle Monorail Project (DEIS). The project represents a significant step toward implementing the region's long-range growth management, economic, and transportation strategy – VISION 2020, and the Metropolitan Transportation Plan – *Destination 2030*.

The first portion of this letter provides comments on the DEIS. The comments primarily address concerns associated with regionally significant land use and transportation issues. The second portion of the letter summarizes the process and steps to be taken to advance the Green Line project from a Candidate project to an Approved project in *Destination 2030*, a necessary step before purchasing right-of-way and initiating construction of Green Line elements.

Destination 2030, the long-range regional transportation plan, includes and generally describes the corridors that were studied as part of the Seattle Transit Study for Intermediate Capacity Transit (ICT). The inclusion in *Destination 2030* is based on the City of Seattle's direction to the Regional Council. These ICT corridors were studied in an effort to identify transit solutions in the city of Seattle with greater passenger-carrying capacity and greater reliability than buses operating in mixed traffic. The ICT study looked at a range of technologies, including elevated rail, bus rapid transit, and electric streetcars. The Seattle Popular Transit Plan (SPTP) developed by the Elevated Transit Company (ETC) is largely based on and generally consistent with the city of Seattle's ICT Study. As a result, the citywide corridors identified in the SPTP are consistent with the corridors that are included in *Destination 2030*. Additionally, *Destination 2030* specifically identifies the link between Ballard and West Seattle through downtown Seattle as the priority corridor for implementation, consistent with the SPTP Phase I recommendation.

However, in order for the project to be fully incorporated into *Destination 2030*, the project sponsor will need to take steps to advance the project from its current status of “candidate project” to “approved project.” Also, once the FEIS is complete for the Green Line, SMP should submit a revised project description to be used in refining the current ICT project in *Destination 2030*. This will update the information in the regional plan and provide consistency with the decisions identified in the FEIS.

Part One: Comments on DEIS

Transportation Connections

All of the transportation actors and organizations responsible for the continuum of activities from long range planning to service delivery must work together to ensure that the Seattle Monorail functions as an integrated part of the regional transportation system. The final EIS should pull together information from various parts of the DEIS and add detail and clarity to the discussions of how the Seattle Monorail Project will work with other entities to provide seamless connections with other modes. On page 3-10, 4th bullet under the 2nd paragraph, the DEIS mentions “connections to other forms of transportation.” This section states that stations “should be located to facilitate transfers to other modes of transportation, such as commuter rail, light rail...” This section should be strengthened to include specifics of how the items mentioned would be accomplished (or include references to other parts of the document that contain the information). The Final EIS must specifically address how the monorail will accommodate:

- Connecting via auto. How is parking being addressed, for example. The DEIS states that auto access trips were classified separately as park-and-ride and “park-and-hide” trips, assuming that some parking spaces would be provided at stations. What is the assumption for parking at stations? Other places in the document state that no parking would be provided at the stations themselves. What provisions are being made to accommodate automobiles while they drop transit riders off or wait to pick them up?
- Connecting via other forms of public transportation. A wide variety of public transportation services will provide important linkages to the Green Line stations. The FEIS should more specifically address how connections would be facilitated between the downtown monorail stations and the waterfront streetcar, ferry service at Coleman Dock, and bus tunnel stations. How will station design be used to enhance pedestrian connections between these public transportation services? Will a way-finding system be developed to orient passengers to supporting public transit services? Also, see comments below under Regional and Local Transit Service.
- Connecting via bicycle (see comments under Pedestrian and Bicycle Access).
- Future connections. How are stations being designed to accommodate future monorail lines within an integrated and functional monorail system? Is thought being given to future connections to other potential high capacity transit technologies or systems?

As part of the discussion of transportation connections, fare structure and administration must be addressed. Specifically address the following two issues: 1) comparability with

Metro bus fares, and 2) participation in the Smartcard project. The DEIS does mention fares that are currently the same as Metro's one zone fare. Are the senior and youth fares also the same as King County Metro? As part of a regionally integrated public transit program, will the relationship to Metro's fares be maintained? Will Seattle Monorail participate in the region's Smartcard project? If so, when and how will this be accomplished?

Specifically, the case must be clearly presented that although the current project segments are local (not regional) in that they are confined to part of the city of Seattle, they are integrated with other regional transportation systems and that other (regional) transportation systems (e.g., Sound Transit light rail alignments and stations) are not precluded by the alignment and station locations of the current proposal.

Impact on Land Use Near Stations

The FEIS should discuss the potential opportunities to attract transit-oriented development adjacent to Green Line stations consistent with Seattle's comprehensive plan and adopted neighborhood plans and zoning. Pedestrian-friendly development near stations will help to build public transit ridership and implement the city's "urban village" development strategy. The FEIS should clearly describe the level of redevelopment and land use intensification that can be expected or accommodated under existing zoning. Based on potential land use changes, the FEIS should describe in a general sense the positive and negative consequences of development in the immediate vicinity of stations.

Pedestrian and Bicycle Access

The DEIS (p. 4-8) states that a survey of existing facilities was conducted for pedestrian connections within a ¼-mile radius and bicycle connections within a ½-mile radius of each station. A ¼-mile distance for pedestrians is a reasonable minimum distance in defining a likely walk shed for transit facilities of this type. However, a ½-mile radius is too small an area to accurately assess potential bike access to stations. A more appropriate bike distance would be 1-3 miles, commonly used in transportation analyses.

Information in the Transportation Background report (Appendix O) appears to include this broader look at bike facilities near stations. The FEIS should clarify the bike shed that was considered as part of the bike access analysis. The FEIS should include a more detailed discussion of other issues related to bike access to stations. Will bikes be allowed on trains? If so, how will they be accommodated? What sort of storage options are being considered at stations where significant bike access is projected?

Regional and Local Transit Service

Lower level-of-service for some riders. As stated in the DEIS, overall the Green Line alternative alignments would clearly lead to beneficial changes in transit service operations for many transit riders in the general vicinity of the proposed stations. Overall transit travel times, total amount of transit service offered, and service coverage would improve significantly. The Green Line would provide fast and efficient connections with higher capacity, higher speed, higher reliability, and more frequent service for a vast majority of existing and new transit riders.

In particular, transit riders with origins and destinations served solely by the Green Line (not requiring transfers between monorail and other travel modes) would have the greatest travel benefits, due to shorter wait times, no transfer times, and higher in-vehicle speeds.

A small percentage of existing transit riders could, however, experience a slightly lower level of service depending on how they access stations and how existing bus routes are restructured. Although it may be difficult to determine the negative impacts that might result for a certain segment of riders, the potential negative impact on a certain segment of riders should be acknowledged and stated as clearly as possible in the FEIS.

Restructured local bus service and ridership forecast. The DEIS states that the SMP and Metro would work together to develop proposals to integrate bus and Green Line service, including truncating or redirecting some existing bus routes to serve as feeder routes to Green Line stations. In addition, the DEIS states that local bus service frequencies may increase on selected routes serving Green Line stations; others may remain as they are today with minor adjustments to improve connectivity. We understand that detailed service implementation planning would begin one to two years before actual implementation.

However, in advance of those details the FEIS should now provide a better idea of the magnitude of bus service changes that might occur. Approximately, how many of the 13 existing bus routes that travel between Ballard and Downtown Seattle, and between West Seattle and Downtown Seattle would be affected? Would existing express bus routes to downtown be eliminated? How many hours of service might be available for redeployment? How would duplicate routes be restructured? The "service redeployment guidelines" to determine the best uses of redeployed transit service do not appear to be included in Appendix O as referenced in the DEIS.

The monorail project has estimated ridership based on a set of assumptions that include the reprogramming of local transit service within the immediate service area of the new monorail line. Ridership assumptions rely on reprogramming bus service to support the monorail project through feeder service to monorail stations. The DEIS states that the model predicts that 82 percent of the forecasted ridership would be diverted from future bus transit trips, and that only 18 percent of the forecasted ridership would represent new transit trips (primarily diverted from autos).

This support bus service influences overall demand, the modal characteristics of accessing station areas, the total travel time savings realized by the project, design requirements for stations themselves, and, in general, nearly all aspects of project performance. The assumption of bus service reprogramming is an area of policy risk that has not been adequately addressed in project documentation, and specifically by the DEIS.

Transfers. The FEIS should include a more detailed discussion of how transfers could impact door-to-door travel times of potential riders. With any of the Green Line alternatives, the number of transfers per trip is expected to increase along these routes. The quality and efficiency of transfers, whether between buses or bus and monorail, have a dramatic impact on how transfers are perceived by riders. Factors determining the quality of transfers include wait time, waiting area conditions, and service reliability. For many Green Line riders, overall travel time and amount of transit service would improve even with the need to transfer. For passengers

transferring from bus to monorail, the wait times would be short, due to the shorter headways associated with the monorail. However, transfer wait times from the monorail to bus could significantly add to a riders travel time and should be a consideration in calculating the level of transit service.

Impact of Guideways

The DEIS assumes certain street cross-sections after construction of the Green Line guideway and stations. There is limited discussion of how the guideways would impact local vehicle travel, bus travel, or bike travel on affected roads. In general, the project description anticipates that guideway columns would be placed to avoid potential impacts to vehicle access and circulation to the extent possible. Where would guideway impacts be most pronounced? What mitigation could be offered? The Green Line stations also include modified and new bus stops and layover zones close to each station to accommodate feeder bus routes. There could be difficulty in providing these areas at some of the stations. The FEIS should more specifically address where and how bus stops and layover facilities are to be accommodated at each station.

Air Quality

The second line of the first paragraph on page 4-224 states that “A conformity analysis is performed for these regional plans as the process used to ensure that all transportation projects in the region do not cause or contribute to any new violations of the NAAQS, particularly for ozone.” The transportation conformity requirements for regional analyses make no distinction between the pollutants – in our region, carbon monoxide, ozone and particulate matter less than 10 microns in diameter. Therefore, the clause “particularly for ozone” should be removed from this sentence.

The fifth paragraph on page 4-224 discusses the three intersections chosen for project-level carbon monoxide analyses. The Conformity Guidebook and state of the practice indicates that the top three intersections based on traffic volumes and the top three intersections based on Level of Service should be analyzed. The FEIS should include a discussion of why only these three intersections were analyzed.

Guidance issued by the Environmental Protection Agency and through local air quality consultation procedures consistent with both state and federal legislation states that project-level analyses must extend to the horizon year of the long-range metropolitan transportation plan, which in our region is 2030. This analysis has a horizon year of 2020; a discussion should therefore be included as to why a 2030 analysis was not conducted and demonstrate that the NAAQS will still be met by 2030.

Additional Comments

VISION 2020 and Destination 2030. References to VISION 2020 – the region’s growth management, economic, and transportation strategy and *Destination 2030* the metropolitan transportation plan should be strengthened in the FEIS. Specifically, under the heading of “regional context” in the Transportation Section, reference should be made to Puget Sound Regional Council’s responsibilities as the federally designated Metropolitan Transportation

Planning Organization (MPO) and state designated Regional Transportation Planning Organization (RTPO). As the MPO and RTPO for the central Puget Sound region, the Regional Council is responsible for developing a long-range regional transportation plan, preparing a short-range implementation strategy, and developing a Transportation Improvement Program (TIP) that includes all regionally significant projects, such as the Green Line. *Destination 2030* should be referenced as the regional context of how the monorail project fits with the rest of the region's transportation system.

Economic Effects. The discussion of economic effects should clearly distinguish between economic benefits in the benefit/cost context and employment and income effects in the input/output modeling context. The travel time savings and other project benefits net of costs are distinct from the employment impacts of the project. Since the monorail project is financed with a local tax, it is especially important to clarify how the job impacts during construction must be netted against the decreased consumer spending from the higher MVET.

Mitigation. The DEIS does a good job of describing the affected environment. Mitigation at this level of project design and development is necessarily general. However, the FEIS should contain more detailed information about mitigation measures that are being committed as part of the project package. What are the impact thresholds that will trigger mitigation, efforts to measure and monitor project development or construction impacts, and means for keeping interested parties informed about the results of ongoing monitoring efforts?

Part Two: Steps to be taken to advance the Green Line project from a Candidate project to an Approved project in *Destination 2030*.

- **Background.** In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – *Destination 2030*. This plan included guidance for capacity investments that categorized all regionally significant improvements as either Candidate or Approved (please refer to *Guidance for Major Capacity Investments* for a more detailed explanation of these distinctions). The Green Line project is included in *Destination 2030* as a candidate project (see page 1 for a more complete description of what was included in *Destination 2030*). Candidate projects must satisfactorily address Approved project criteria before being designated as Approved in *Destination 2030*.
- **Process.** *Destination 2030* includes a policy that enables the Regional Council's Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the requirements identified in the *Guidance for Major Capacity Investments* for moving a project from Candidate to Approved status.
 1. Regional Council staff review and determine consistency of the project's final preferred alternative with *Destination 2030* policies.
 2. Sponsor provides documentation for completed benefit cost analysis.
 3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design

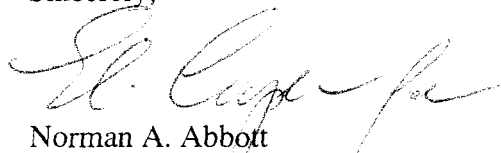
of the given project or program to determine regional policy consistency.

4. Sponsor satisfactorily addresses any other planning requirements, which might have been specified by the Regional Council's Executive Board for a given project.
5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded.
6. The project's final preferred alternative is reviewed for consistency with the current plan air quality conformity analysis; a new air quality plan conformity determination may be required.

When a Candidate project meets the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

In conclusion, the Regional Council would like to again thank the study team for their commitment to this project. If you have questions about our comments, please call me at (206) 464-7134 or Ned Conroy, Principal Planner at (206) 587-5670.

Sincerely,

A handwritten signature in cursive script, appearing to read "N. Abbott", followed by a horizontal line.

Norman A. Abbott
SEPA Responsible Official

cc: Ned Conroy, Principal Planning
Eli Cooper, Transportation Planning Director